To: FCC Commissioners

RE: Comments by - Robert A. Goodson

"I am opposed to this proposal as it limits the nature of the amateur radio service to pre-existing protocols of limited or little use in emergency communications for use in a disaster or incident of national significance. While newer innovation may occur that can be used in this proposals context, none of the existing modes have been used widely or effective in communicating in a disaster context in the past decade, in my active experience as a Red Cross communications responder."

VHF Packet has been used for years as a primary emergency communications protocol. It is still the primary emergency communications protocol in most situations. The ARRL HF Skipnet, which uses Packet, has existed for many years and serves to forward emergency traffic. The Digital-NTS has existed for years doing the same function using Pactor I and Pactor II. The Digital-NTS has moved to using Pactor II on some stations but many remain using only Pactor I.

Since the commenter provides no measurement metric to determine how "effective" these various systems are, there is no way to evaluate the truth of the above statment. Effectivness includes more than pure speed, it also includes spectrum efficiency.

"Amateur radio is still developing new and more advanced methods of using spectrum effectively. This rule would negate the existing innovation, force older less reliable and more logistically challenging methods of communication, (which declined as a direct result of cost, time and operator skill levels needed for marginal communication effectiveness) with a direct impact on emergency communication roles filled by the amateur radio service license holder."

This rule would negate no innovations.

In fact, Pactor III *narrows* its bandwidth under marginal conditions, it doesn't widen it.

Since the commenter does not identify what "more logistically challenging" means, it is impossible to evaluate the truth of his claim.

Since Packet radio is probably the least costly (modems for use on HF packet can be purchased new in the $200 range while modems for Pactor III will run close to $1100 new) method of operating today, the authors claim here is incorrect.

The author does not provide any metrics for measuring the amounts of time or operator skill necessary for any mode or protocol currently in use on the amateur bands. It is, therefore, impossible to verify the truth of his claim.

"Finally I would point out that none of the older protocols have been kept current with new technology's and communications equipment. Unlike the newer protocols now in use, the older RTTY and narrow band software, equipment and such are essentially currently limited to radio to radio, single point keyboard to keyboard transmissions with very limited store and forward capability's."

The author is obviously unfamiliar with the capabilities of even the most basic Packet BBS systems and Packet forwarding networks. These networks have been providing advance store and forward operations for over two decades. In fact, the transfer command protocol used by Winlink 2000 was initially developed for controlling the forwarding of messages between Packet BBS systems.

"A key point here is that no current store and forward RTTY software runs on 64 Bit Operating systems, and the older programs (in most cases) require obsolete computer platforms running on (older) non-supported operating systems. If the proposal was to have much

valid in discussing a way forward for a disaster communications role, one would think that the protocols proposed would have been kept current with existing technology. I find it quite telling that the petitioners preferred modes have decayed and become marginalized in amateur communications, while the newer modes (which allow mobile phone and computer SMS, Store and forward, internet interconnects, Tcp/Ip and a host of newer benefits) are booming. If anything this trend would see one argue for more automatically controlled data sub bands and to widen them."

The author is obviously unfamiliar with the capabilities of amateur radio today. The use of advanced Linux 64bit operating systems combined with the JNOS 3.x software provides significant capabilities of store and forward, internet connectivity, SMS and cell phone connectivity -- all using Packet radio.

I would point out that amateur-to-cell phone communications on a regular basis is against the rules of Part 97. It is, again, evidence of the corrupting influence being propagated in amateur radio today that the Amateur Radio Service exists to be a common carrier providing amateur-to-Third party communications instead of intercommunications between amateur control operators.